

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,¹

Debtors.

)
) Chapter 11
)

) Case No. 25-10068 (CTG)
)

) (Jointly Administered)
)

) **Hearing Date: September 22, 2025, at 2:00 p.m. (ET)**
)

) **Obj. Deadline: August 25, 2025, at 4:00 p.m. (ET)**

**NOTICE OF MOTION OF PLAN ADMINISTRATOR AND
GUC TRUST FOR ENTRY OF A SECOND ORDER (I) ENLARGING
THE PERIOD WITHIN WHICH PLAN ADMINISTRATOR AND GUC
TRUST MAY REMOVE ACTIONS AND (II) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that, on August 11, 2025, the Plan Administrator and the GUC Trust, each appointed in the above-captioned cases, filed the *Motion of Plan Administrator and GUC Trust for Entry of a Second Order (I) Enlarging the Period Within Which Plan Administrator and the GUC Trust May Remove Actions and (II) Granting Related Relief* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (“Court”).

PLEASE TAKE FURTHER NOTICE that a copy of the Motion is being served with this notice. A copy of the Motion is also available on (i) the Court’s website: www.deb.uscourts.gov and (ii) the website maintained by the Debtors’ claims and noticing agent, Kroll, LLC: <https://cases.ra.kroll.com/Joann2025/Home-DocketInfo>.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion is scheduled for **September 22, 2025, at 2:00 p.m. (prevailing Eastern Time)** before The Honorable Craig T. Goldblatt, U.S. Bankruptcy Judge, United States Bankruptcy Court for the District of Delaware, 3rd Floor, Courtroom No. 7, 824 North Market Street, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion and the entry of an order approving the Motion must be filed on or before **August 25, 2025 at 4:00 p.m. (prevailing Eastern Time)** (the “Objection Deadline”) with the Court, 3rd Floor, 824 North Market Street, Wilmington, Delaware 19801, and served upon the following parties so as to be actually received by the Objection Deadline: (a) the undersigned counsel to the Plan Administrator,

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

(i) Cole Schotz P.C., 500 Delaware Avenue, Suite 600, Wilmington, Delaware 19801, Attn: Patrick J. Reilley (preilley@coleschotz.com), Stacy L. Newman (snewman@coleschotz.com), Jack M. Dougherty (jdougherty@coleschotz.com), and Michael E. Fitzpatrick (mfitzpatrick@coleschotz.com) and (ii) Hahn Loeser & Parks LLP, 200 Public Square, Suite 2800, Cleveland, Ohio 44114, Attn: Christopher B. Wick (cwick@hahnlaw.com); (b) the undersigned counsel to the GUC Trust, (i) Kelley Drye & Warren LLP, 3 World Trade Center, 175 Greenwich Street, New York, New York 10007, Attn: Eric R. Wilson (ewilson@kelleydrye.com), Maeghan J. McLoughlin (mmcloughlin@kelleydrye.com), and Charles J. Fendrych (cfendrych@kelleydrye.com); (c) the United States Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn.: Malcolm M. Bates (malcolm.m.bates@usdoj.gov); (d) counsel to the Prepetition ABL Agent, Morgan, Lewis & Bockius LLP, One Federal Street, Boston, Massachusetts 02110, Attn.: Christopher Carter (christopher.carter@morganlewis.com) and Marjorie Crider (marjorie.crider@morganlewis.com); (e) counsel to the Prepetition FILO Agent, Choate Hall & Stewart LLP, 2 International Place, Boston, Massachusetts 02110, Attn.: John Ventola (jventola@choate.com) and Jonathan Marshall (jmarshall@choate.com); (f) counsel to the Prepetition Term Loan Lender Ad Hoc Group, Gibson, Dunn & Crutcher LLP, 200 Park Avenue, New York, New York 10166, Attn.: Scott Greenberg (SGreenberg@gibsondunn.com), Kevin Liang (KLiang@gibsondunn.com), and Josh Brody (JBrody@gibsondunn.com); (g) counsel to the Prepetition Term Loan Agent, ArentFox Schiff LLP, 1301 Avenue of the Americas, 42nd Floor, New York, New York 10019, Attn.: Jeffrey Gleit (jeffrey.gleit@afslaw.com), 1717 K Street NW, Washington, D.C. 20006, Attn.: Jonathan Bagg (jonathan.bagg@afslaw.com), and 233 South Wacker Drive, Suite 7100, Chicago, Illinois 60606, Attn.: Matthew Bentley (matthew.bentley@afslaw.com); (h) counsel to GA Joann Retail Partnership, LLC, Lowenstein Sandler LLP, One Lowenstein Drive, Roseland, NJ 07068, Attn: Andrew D. Behlmann (abehlmann@lowenstein.com), Jean Nicolas Samedi Jr. (jsamedi@lowenstein.com), and Emily Jewell (ejewell@lowenstein.com); and (i) all parties that have filed renewed requests to receive notice pursuant to Bankruptcy Rule 2002.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

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Dated: August 11, 2025
Wilmington, Delaware

/s/ James E. O'Neill

PACHULSKI STANG ZIEHL & JONES, LLP

Bradford J. Sandler (No. 4142)
James E. O'Neill (No. 4042)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, DE 19801
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: bsandler@pszjlaw.com
joneill@pszjlaw.com

-and-

KELLEY DRYE & WARREN LLP

Eric R. Wilson (admitted *pro hac vice*)
Maeghan J. McLoughlin (admitted *pro hac vice*)
Charles J. Fendrych (admitted *pro hac vice*)
3 World Trade Center
175 Greenwich Street
New York, New York 10007
Telephone: (212) 808-7800
Facsimile: (212) 808-7897
Email: ewilson@kelleydrye.com
mmcloughlin@kelleydrye.com
cfendrych@kelleydrye.com

Co-Counsel to the GUC Trustee

/s/ Michael E. Fitzpatrick

COLE SCHOTZ P.C.

Patrick J. Reilley (No. 4451)
Stacy L. Newman (No. 5044)
Jack M. Dougherty (No. 6784)
Michael E. Fitzpatrick (No. 6797)
500 Delaware Avenue, Suite 600
Wilmington, Delaware 19801
Telephone: (302) 652-3131
Facsimile: (302) 652-3117
Email: preilley@coleschotz.com
snewman@coleschotz.com
jdougherty@coleschotz.com
mfitzpatrick@coleschotz.com

- and -

HAHN LOESER & PARKS LLP

Christopher B. Wick (admitted *pro hac vice*)
200 Public Square, Suite 2800
Cleveland, Ohio 44114
Telephone: (216) 274-2489
Facsimile: (216) 241-2824
Email: cwick@hahnlaw.com

Co-Counsel to the Plan Administrator